

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

*Plaintiff,*

v.

Case No. 1:23-cv-06418-JGLC

LEON BLACK,

*Defendant.*

**DECLARATION OF PETER GWYNNE**

I, PETER A. GWYNNE, hereby declare under penalty of perjury that the following is true and correct:

1. My name is Peter A. Gwynne. I am a partner at Perry Law and an attorney licensed to practice law in the state of New York. I am also admitted to practice law in this court.
2. I respectfully submit this declaration in support of Defendant's Reply Memorandum in Support of his Motion to Amend Caption (the "Motion"). I am fully familiar with all matters set forth in this Declaration based on personal knowledge about the facts and matters below.
3. As of November 4, 2024, Plaintiff has noticed service of thirteen subpoenas *duces tecum* to individuals who are not party to this action (the "Third-Party Subpoenas"), which include a total of 419 requests for documents and information (the "Requests").  
4. [REDACTED]  
[REDACTED]  
[REDACTED]
5. Of the 419 Requests issued to date, only 71 mention Defendant.

6. The vast majority of the Requests concern Jeffrey Epstein, his cohorts, and/or various businesses and political leaders, including, but not limited to former President Clinton, two former United States Senators, two former cabinet officers, several owners of professional sports franchises in Washington, D.C., and a Hall of Fame football coach.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York, on November 4, 2024.

By: /s/ Peter A. Gwynne

Peter A. Gwynne  
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